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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO/OAKLAND DIVISION

ALAMEDA COUNTY MALE PRISONERS
 And Former Prisoners, DANIEL GONZALEZ,
 et al. on behalf of themselves and others
 similarly situated, as a Class, and Subclass
PLAINTIFFS,

vs.

ALAMEDA COUNTY SHERIFF'S
OFFICE, et al
DEFENDANTS.

No. 3:19-cv-07423 JSC

**PARTIES JOINT STATEMENT IN
 RESPONSE TO COURT ORDER
 Dkt. 199**

Hon. Jacqueline S. Corley, Presiding

This court's Order (Dkt 199) set two depositions: Tiara Arnold's for July 13, 2022 and Donald Corsetti's for July 15, 2022. The Order also required the parties to meet and confer on the scheduling of the remaining depositions.

The deposition of Tiara Arnold's, set for July 13, 2022, did not take place. None of the defendants noticed the deposition, and arrangements for the deposition were not arranged in sufficient time. Tiara Arnold's deposition was taken and completed on July 15, 2022, in lieu of Donald Corsetti's deposition. At the conclusion of Tiara Arnold's deposition, the parties met and conferred. Plaintiffs were represented by Yolanda Huang; County defendants were represented by Jonathan Belaga. Defendant Wellpath was represented by Peter Bertling. Defendant Aramark was represented by Charles J. Reitmeyer.

The parties agreed to the following deposition schedule:

Date	Deponent	
7.15. 2022	T. Arnold	Completed
8. 16. 2022	Rasheed Tucker	
8.17. 2022	Eric Wayne	
8.18. 2022	Donald Corsetti	

Timothy Phillips is in the custody of Bureau of Prisons at Herlong, which is in covid lockdown; no visitors of any kind are permitted. The wait for a video deposition is currently two (2) months.

Defendants did not come to an agreement on how they wanted to proceed with regard to Timothy Phillips.

PLAINTIFFS' POSITION

Plaintiffs agreed to the above deposition dates. Plaintiffs request that the remaining defendants, Wellpath and the County, be required to answer or otherwise respond no later than September 1, 2022, which is 14 days after the date of the last deposition currently scheduled, whether or not the depositions as currently scheduled are completed. There has already been significant time for defendants' requested depositions.

COUNTY DEFENDANTS' POSITION

Counsel for County Defendants caught COVID and was unable to prepare his clients in a timely manner to present Tiara Arnold for Deposition on July 13. For that delay, Counsel for the County Defendants apologizes to the Court and the other parties involved in this litigation. The parties did meet and confer regarding dates for the depositions of the previously-agreed Plaintiffs, however, Plaintiffs' counsel informed Defendants that she was no-longer available for deposition on August 3 (as previously discussed), and the parties were unable to schedule additional depositions beyond August at the time. The parties were able to agree that it is not possible to schedule more than one deposition per day. As a result, the current schedule for depositions will need to continue through September, at least.

DEFENDANT ARAMARK'S POSITION

Aramark concurs with the County Defendants' position.

Dated: June 30, 2022,

LAW OFFICE OF YOLANDA HUANG

By: /s/ Yolanda Huang
YOLANDA HUANG,
Attorney for Plaintiffs

1 Dated: July 19, 2022

SKANE MILLS LLP

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3 By: /s/ Jonathan J. Belaga

4 Attorneys for ALAMEDA COUNTY SHERIFF'S
5 OFFICE, DEPUTY IGNONT, DEPUTYJOE and
6 COUNTY OF ALAMEDA

7 Dated: July 19, 2022

MORGAN, LEWIS & BOCKIUS LLP

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9 By: /s/ Charles J. Reitermeyer (pro hac vice)

10 Attorneys for Defendant Aramark
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